

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 22-CV-11553

NATALIE ANDERSON,
Plaintiff,

V.

MARRIOTT INTERNATIONAL, INC.,
RESIDENCE INN NASHUA (DBA of NASHUA TS LODGING,
LLC); TRUE NORTH HOTEL GROUP
AND JENNIFER BROOKS,
Defendants.

MOTION FOR DEFAULT DEFENDANT MARRIOTT INTERNATIONAL, INC.
PURSUANT TO
REFILED MOTION FOR DEFAULT FILED IN STATE COURT

1. The plaintiff hereby moves the court to default Defendant Marriott International Inc., in this case for failure to file an answer or to respond to the summons and complaint in a timely manner in state court.
2. The plaintiff filed a motion for default on September 22, 2022 in state court.
3. NB: See the accompanying motion for default against Defendant Marriott International Inc. that was filed in state superior court, being filed today in this court.
4. Because the case was removed, the motion for default that was filed in state court now has to be re-filed in federal court. See Exhibit A.
5. Defendant Marriott International Inc., did not join the removal to federal court.
6. The only reason why the default did not enter in state court is because Defendant True North Hotel Group and Defendant Jennifer Brooks submitted a removal for themselves, though not for Defendant Marriott International Inc.. Defendant Marriott International Inc. did not enter an appearance in state court nor request removal to federal court.
7. Because Defendant Marriott International Inc., did not request removal, then they were still required to answer by September 20, 2022 in state court. They failed to do so by the required deadline. They therefore failed to comply with the requirement to avoid default.
8. This court should treat this motion as having been filed on September 22, 2022 because that was the date it was filed in state court. See again See the accompanying motion for default against Defendant Marriott International Inc. that was filed in state superior court, being filed today in this court.
9. Wherefore, the plaintiff requests that this court enter default against Defendant Marriott International Inc..
10. Please grant the relief requested or other relief the court deems just and proper.

Respectfully submitted,

/s/ Natalie Anderson

Natalie Anderson

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September 30, 2022

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing MOTION was mailed to the following persons at the address specified herein: Amy Yarbo, counsel for the defendants, at 250 Summer Street, Boston, MA 02210.

Respectfully submitted,

/s/ Natalie Anderson

Natalie Anderson

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September 30, 2022